

THE HONORABLE TANA LIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CORNER COMPUTING SOLUTIONS SP, et
al.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

No. 2:23-cv-00939 TL

DECLARATION OF CARA
WALLACE IN SUPPORT OF
DEFENDANT GOOGLE'S
RESPONSE TO ORDER TO SHOW
CAUSE

I, Cara Wallace, declare and state as follows:

1. The information contained in this declaration is true and correct to the best of my knowledge, and I am of majority age and competent to testify about the matters set forth herein.

2. I am an attorney with Perkins Coie LLP, and I serve as counsel for Defendants Google, LLC ("Google"), in the above-entitled action. I submit this declaration in support of Defendant Google's Response to the Order to Show Cause.

3. Attached hereto as **Exhibit A** is a true and correct copy of Plaintiff's "Initial Disclosures Pursuant to Federal of Civil Procedures Rule 26," dated August 4, 2023.

4. Absent dismissal of Plaintiff's claims, Google's Terms of Service limit Google's total liability arising out of relating to those terms is limited to the greater of \$200 or (2) the fees paid to use the relevant services in the 12 months before the dispute. VirusTotal's

1 terms of service include a limitation of liability provision that prohibits recovery from
2 VirusTotal or its parents and affiliates for any direct, indirect, incidental, special,
3 consequential, exemplary or punitive damages.

4
5 **I declare under penalty of perjury and the laws of the State of Washington that**
6 **the foregoing is true and correct.**

7 DATED this 29th day of November, 2023, at Saxman, Alaska.

8
9
10 s/Cara Wallace
11 Cara Wallace, WSBA No. 50111
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Exhibit A

Dale J. Lake Corner
22823 144th Pl W
Bothell WA 98021

CERTIFIED MAIL®



7022 1670 0001 1378 1279

Retail



RDC 99



98101

U.S. POSTAGE PAID
FCM LG ENV
KENMORE, WA 98028
AUG 04, 2023

\$5.94

R2303S100995-05

First Class Mail

PERKINScoie

Perkins Coie LLP | PerkinsCoie.com

1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099

Cara Wallace
Jure Stam

RECEIVED

AUG 07 2023

PERKINS COIE LLP

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5 UNITED STATES DISTRICT COURT
6 WESTERN DISTRICT OF WASHINGTON AT SEATTLE
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9 CORNER COMPUTING SOLUTIONS SP,

Case No.: 2:23-CV-00939 TL

10 Et al.,

INITIAL DISCLOSURES PURSUANT

11 Plaintiff,

TO FEDERAL OF CIVIL PROCEDURE

12 v.

RULE 26

13 GOOGLE LLC,

14 Defendant.
15

16 TO DEFENDANT GOOGLE LLC AND COUNSEL OF RECORD:
17

18 PLAINTIFF CORNER COMPUTING SOLUTIONS, referred to below as the "disclosing party," hereby submits
19 the following disclosures in accordance with Fed. R. Civ. P. 26 ("Rule 26") Plaintiff's Initial Disclosures
20 Pursuant to Fed. R. Civ. P. 26

21 Rule 26(a)(1)(A)(i) – The name and, if known, the address and telephone
22 number of each individual likely to have discoverable information – along with the
23 subjects of that information – that the disclosing party may use to support his or
24 her claims or defenses, unless the use would be solely for impeachment:
25

26 GOOGLE LLC

27 ADDRESS: 1600 Amphitheatre Parkway Mountain View CA, 94043

28 PHONE: 650 253-0000
29

Subject Matter of Discoverable Information

Section A:

1. The Email address or email addresses associated with the "Ad Words" and or "Google Maps" or otherwise "Review Accounts" of each of the accounts that left one star reviews on the "Corner Computing Solutions" Google review page or Ad words account. This at the time the review was left by the account on the "Corner Computing Solutions" Google review page, Ad words account or Google Maps page.
2. The phone number or phone numbers associated with the "AD Words" and or "Google Maps" or otherwise "Review Accounts" of each of the accounts that left one star reviews on the "Corner Computing Solutions" Google review page or Ad words account. This at the time the review was left by the account on the "Corner Computing Solutions" Google review page, Ad words account or Google Maps page.
3. The Time (Hour Minute Second), date(Month Day Year) associated with the "AD Words" and or "Google Maps" or otherwise "Review Accounts" of each of the accounts that left one star reviews on the "Corner Computing Solutions" Google review page or Ad words account. This at the time the review was left by the account on the "Corner Computing Solutions" Google review page, Ad words account or Google Maps page.
4. The IP (internet protocol) both LAN and WAN address associated with each of the 1 star reviews associated with the "AD Words" and or "Google Maps" or otherwise "Review Accounts" of each of the accounts that left one star reviews on the "Corner Computing Solutions" Google review page or Ad words account. This at the time the review was left by the account on the "Corner Computing Solutions" Google review page, Ad words account or Google Maps page.
5. The name, user name or other associated account information that is not a password for each of the 1 Star reviews associated with the "AD Words" and or "Google Maps" or otherwise "Review Accounts" of each of the accounts that left one star reviews on the "Corner Computing Solutions" Google review page or Ad words account. This at the time the review was left by the account on the "Corner Computing Solutions" Google review page, Ad words account or Google Maps page.
6. The Name and position of each employee including management in control of administrating the "CORNER COMPUTING SOLUTIONS" account specifically or has otherwise had administrative contact thereof. This includes the "escalation team" in charge of going through escalated review removal submissions.
7. The Date and time of each account's creation and ip address the account was created from. This includes both Lan and Wan if available.
8. The service provider and location of each of the ip addresses at the time they posted the review.

- 73 9. The ip address or ip addresses of each of the troll accounts that left comments on investigations
 74 I was working with on VIRUS TOTAL. This at the time the comments were left.
 75
 76 10. The email addresses for each of the accounts that left comments on investigations I was working
 77 with on VIRUS TOTAL. This at the time the comments were left.
 78
 79 11. The name and position in the company of the person or persons who banned the "DALE JAKE
 80 CORNER" account on VIRUS TOTAL with the email **REDACTED FOR PII**
 81
 82 12. The Comment content of the "DALEJAKECORNER" VIRUS TOTAL ACCOUNT with the email
 83 **REDACTED FOR PII** for all comments left. This is requested in electronic format only. If
 84 un available it should be noted as such. The format should be individual files for each comment,
 85 with links to the domains, ip addresses, or files and or links the comments were left on per file in
 86 the contents of the file.
 87
 88

89 Section B:

90 Listing of specific accounts as it pertains to Section A: Subject Matter of Discoverable Information

- 91 1. Mr. Murdock
 92 2. Mike Huntleton
 93 3. Joe Swanson
 94 4. TNF Gaming Live
 95 5. Somebody
 96 6. Itz F8Hyper
 97 7. Chris Hansen
 98 8. Markeimm
 99 9. Unknown ?
 100 10. Matt
 101 11. Tim Curry
 102 12. No Account
 103 13. Damair Ptronovsky
 104 14. MKHNT Mike Huntleton <https://www.virustotal.com/gui/user/MKHNT/comments>
 105 15. CameronL Augmented Thunder <https://www.virustotal.com/gui/user/CameronL>
 106 16. NeePScambaiting NeeP Scambaiting youtube.com/NeeP94
 107 <https://www.virustotal.com/gui/user/NeePscambaiting/comments>
 108 17. deleted_user Deleted User
 109 18. PavelTheRuski Pavel Krebkenko <https://www.virustotal.com/gui/user/PavelTheRuski/comments>
 110 19. YaManJerryBear Jerry Springer
 111 <https://www.virustotal.com/gui/user/YaManJerryBear/comments>
 112 20. AugmentedThunder Somebody
 113 <https://www.virustotal.com/gui/user/AugmentedThunder/comments>
 114

Plaintiff's Initial Disclosures Pursuant to Fed. R. Civ. P. 26
 Rule 26(a)(1)(A)(ii) – A copy – or a description by category and location –
 of all documents, electronically stored information, and tangible things that the
 disclosing party has in his or her possession, custody, or control and may use to
 support his or her claims or defenses, unless the use would be solely for
 impeachment. (Please note that the disclosing party may either produce the
 documents, electronically stored information, and tangible things or fill in the table
 below.)

DESCRIPTION BY CATEGORY	DESCRIPTION BY LOCATION
-------------------------	-------------------------

Electronically Stored Information	In personal possession
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Screen capture evidence in PNG format	
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As submitted and served with original Summons and Complaint in paper format	
---	--

(The court would not allow for submission of electronic documents)	
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Plaintiff's Initial Disclosures Pursuant to Fed. R. Civ. P. 26

Rule 26(a)(1)(A)(iii) – A computation of each category of damages claimed
 by the disclosing party, who must also make available for inspection and copying
 as under Rule 34 the documents or other evidentiary material (unless privileged or
 protected from disclosure) on which each computation is based, including
 materials bearing on the nature and extent of injuries suffered:

COMPUTATION:

1. GOOGLE LLC'S BAN OF THE "DALEJALECORNER" VIRUS TOTAL ACCOUNT and destruction of comments which contained submitted or submittable evidence without notification which destroyed the comments and evidence held therein. The comments held specific data, including but not limited to screen captures, enumeration of server data, whois data, reverse whois data, information pertaining to phone numbers including but not limited to service providers, names, addresses, domain names, sub domains, connected or contacted websites via whois, direct connection, ip communications, service providers, malware communications, admins, techs and other administrators, links to files in web directories including but not limited to "tech support scam pages" and malware delivery pages.

This log of evidence data was taken at the time of the discovery of bot networks, malware, malware networks, tech support scam page fake alerts and or connected files and servers. This includes links to different Virus Total Pages that my investigation covered to link together the data to get a clearer picture of the scope of the investigation itself. That so the data would be easily found by other computer security researches including federal authorities, US Allies, service providers and other researches. The Data itself took time, effort and in many cases hours of research, typing, recording, screen capturing and mapping to complete. Furthermore, destroying the account and banning it due to the complaints of trolls, whom remain unbanned has caused damage to the good name of my business. This totals out to over 3 years of hard work and expertise.

DAMAGE TOTAL: 50 MILLION USD Destruction of unrecoverable work, loss of business revenue and unrecoverable damage to my good name and that of my business due to the account being a representation to prospective clients of my ability with computing and software systems.

DOCUMENTS AND OTHER EVIDENTIARY MATERIAL: Those Exhibits contained in the complaint as filed with original case number: 23 2 03187 31 Snohomish County Superior Court Everett Washington as served to GOOGLE LLC. The contents of the comments as mentioned appear to be destroyed and unrecoverable. Only GOOGLE LLC or its counsel or possibly law enforcement may have a copy that is complete. I do have some of the comments at length stored.

2. GOOGLE LLC'S BREACH OF CONTRACT VIA NOT ACTING IN GOOD FAITH AND FAIR DEALING:

As seen in the original complaint and summons submitted may 1 2023 Case Number 23 2 03187 31 at the Snohomish County Superior Court in Everett Washington, Google's breach of contract and not acting in good faith and fair dealing has caused undue hardship via loss of income, psychological strain, loss of business and revenue, unrecoverable damage to my good name and that of my business. This includes having to go through the process of engaging in this suit.

DAMAGE TOTAL: 100 MILLION USD.

DOCUMENTS AND OTHER EVIDENTIARY MATERIAL: Those Exhibits contained in the complaint as filed with original case number: 23 2 03187 31 Snohomish County Superior Court Everett Washington as served to GOOGLE LLC.

The only data I have other than the submitted Complaint and Summons that was served to GOOGLE LLC's is the original screen captures in electronic format that are transferable and currently in my possession.

Plaintiff's Initial Disclosures Pursuant to Fed. R. Civ. P. 26

Rule 26(a)(1)(A)(iv) – For inspection and copying as under Rule 34, any

insurance agreement under which an insurance business may be liable to satisfy all

or part of a possible judgment in the action or to indemnify or reimburse for

payments made to satisfy the judgment:

I have no such insurance agreement nor access to any such agreement.

Plaintiff's Initial Disclosures Pursuant to Fed. R. Civ. P. 26

DATED: Aug 4 2023

(signature)

(name) Dale Jake Corner

22823 14th Pl west Bothell WA
98021

Plaintiff in Pro Per

PROOF OF SERVICE

I, Dale Jake Corner (name), declare as follows. I am over the
age of 18 years. My address is: 22823 14th Pl West Bothell WA 98021
On Aug 4 2023 (date), I served the foregoing document described
as:
Plaintiff's Initial Disclosures Pursuant to FRCP 26
on all interested parties in this action by placing a true and correct copy thereof in a
sealed envelope, with first-class postage prepaid thereon, and deposited said
envelope in the United States mail in Kenmore Washington, addressed
to: (city, state)

Cara Wallace | Perkins Coie LLP
COUNSEL
1201 Third Avenue Suite 4900
Seattle, WA 98101-3099

I declare under penalty of perjury that the foregoing is true and correct.

Executed on _____ at _____.

(date) Aug 4 2023

(place of signing) Kenmore Post office

(signature) Dale Jake Corner

(name) Dale Jake Corner